

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In re:

BLOCKFI INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 22-19361 (MBK)

Jointly Administered

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

**NOTICE OF MOTION OF GENOVA BURNS LLC FOR (I) AUTHORITY TO SEAL  
THE REDACTED PORTIONS OF THE FIRM'S MONTHLY FEE STATEMENT FOR  
AUGUST 2023 REGARDING PERSONAL IDENTIFIABLE INFORMATION OF  
MEMBERS OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND  
(II) GRANTING RELATED RELIEF**

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PLEASE TAKE NOTICE that Genova Burns LLC ("**GB**"), local counsel to the Official Committee of Unsecured Creditors (the "**Committee**") appointed in the Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the "**Debtors**"), will move on **October 12, 2023 at 10:00 a.m. (EDT)** (the "**Return Date**") before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the "**Motion to Seal**") for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the redacted portions of the *Monthly Fee Statement of Genova Burns LLC, Local Counsel to Official Committee of Unsecured Creditors for the Period August 1, 2023 through August 31, 2023* (the "**GB Monthly Fee Statement**"), filed substantially contemporaneously herewith,<sup>2</sup> and (B) granting the Committee such other and further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

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<sup>2</sup> A redacted version of the GB Monthly Fee Statement has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the GB Monthly Fee Statement is being filed immediately after the filing of this Motion to Seal in accordance with this Court's procedures for electronically requesting that a document be sealed (see *Process to Electronically Request that a Document be Sealed* (<http://www.njb.uscourts.gov/content/process-electronically-request-document-be-sealed>)).

**PLEASE TAKE FURTHER NOTICE** that GB shall rely upon the Application filed herewith in support of the Motion to Seal and that no brief is being filed since the legal basis upon which relief should be granted is set forth in the Application.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with D.N.J. LBR 9013-2(a)(2), objections, if any must be filed with the Clerk of the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received by **no later than seven (7) days before the Return Date.**

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: September 18, 2023

**GENOVA BURNS LLC**

By: /s/ Donald W. Clarke

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